

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
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| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff-Intervenor, |) | |
| |) | |
| v. |) | No. 18 C 5452, |
| |) | No. 22 C 6052, |
| WALGREEN CO., WALGREENS BOOTS |) | No. 22 C 6366, and |
| ALLIANCE, INC., WALGREEN EASTERN CO., |) | No. 23 C 1617 |
| INC., BOND DRUG COMPANY OF ILLINOIS, |) | |
| DUANE READE, DUANE READE, INC., |) | Judge Lefkow |
| WALGREEN ARIZONA DRUG CO., HAPPY |) | |
| HARRY'S INC., WALGREEN LOUISIANA |) | JURY TRIAL DEMANDED |
| CO., INC., and WALGREEN OF HAWAII, LLC, |) | |
| |) | |
| Defendants. |) | |

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| UNITED STATES OF AMERICA, <i>ex rel.</i> T.J. |) | |
| NOVAK, |) | |
| |) | |
| Plaintiff, |) | No. 18 C 5452 |
| |) | |
| v. |) | Judge Lefkow |
| |) | |
| WALGREENS BOOTS ALLIANCE, INC., |) | |
| |) | |
| Defendant. |) | |

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| UNITED STATES, <i>ex rel.</i> ELMER MOSLEY, |) | |
| |) | |
| Plaintiff, |) | |
| |) | No. 22 C 6052 |
| v. |) | |
| |) | Judge Lefkow |
| WALGREEN CO., |) | |
| |) | |
| Defendant. |) | |

UNITED STATES OF AMERICA *ex rel.* K&V)
GROUP, LLP and on behalf of the STATE of)
FLORIDA,)

Plaintiffs,)

v.)

WALGREENS BOOTS ALLIANCE, INC.,)
WALGREEN CO., BAXTER DRUG, INC.,)
DUANE READE HOLDINGS, INC., DUANE)
READE, INC., HAPPY HARRY'S DISCOUNT)
DRUG STORES, INC., HAPPY HARRY'S, INC.,)
STEPHEN L. LAFRANCE PHARMACY, INC.,)
WALGREEN HASTINGS CO., WALGREEN)
EASTERN CO., INC., BOND DRUG)
COMPANY OF ILLINOIS, LLC, WALGREEN)
LOUISIANA CO., INC., WALGREEN)
MERCANTILE CORP., WALGREEN OF)
HAWAII, LLC, WALGREEN OF MAUI, INC.,)
WALGREEN OF PUERTO RICO, INC.,)
WALGREEN OF SAN PATRICIO, INC.,)
WALGREENS OF NORTH CAROLINA, INC.,)
WALGREENS OF MASSACHUSETTS, LLC,)
WALGREENS STORE NO. 3288, LLC,)
WALGREENS STORE NO. 3332, LLC,)
WALGREENS STORE NO. 3680, LLC,)
WALGREENS STORE NO. 4650, LLC,)
WALGREENS STORE NO. 4651, LLC,)
WALGREENS STORE NO. 5576, LLC,)
WALGREENS STORE NO. 5838, LLC,)
WALGREENS STORE NO. 7839, LLC,)
WALGREEN OF US VIRGIN ISLANDS, LLC,)
WALGREEN OSHKOSH, INC., WALGREEN)
PHARMACY SERVICES EASTERN, LLC,)
WALGREEN PHARMACY SERVICES)
MIDWEST, LLC, WALGREEN PHARMACY)
SERVICES SOUTHERN, LLC, WALGREEN)
PHARMACY SERVICES WESTERN, LLC, and)
WALGREEN PHARMACY SERVICES WHS,)
LLC, and WALGREEN OF NEW MEXICO, INC,)

Defendants.)

No. 22 C 6366

Judge Lefkow

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| UNITED STATES OF AMERICA, <i>ex rel.</i> |) | |
| PATRICK AWA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | No. 23 C 1617 |
| v. |) | |
| |) | Judge Lefkow |
| |) | |
| WALGREEN CO. and WALGREENS BOOTS |) | |
| ALLIANCE, INC., |) | |
| |) | |
| Defendants. |) | |

CONSENT MOTION
TO EXTEND THE DATE FOR SERVICE OF THE COMPLAINTS

Relator T.J. Novak, with the consent of the United States of America, Defendants Walgreen Co., Walgreens Boots Alliance, and the other named Walgreens Entities (collectively, “Walgreens”), and Relators Elmer Mosley, K&V Group, LLP, Patrick Awa, moves to extend the date for service of the complaints on Walgreens for 31 days, or from March 17, 2025, to April 17, 2025. Walgreens’s date to answer or otherwise plead to all complaints will remain May 15, 2025. In support of this motion, Relator Novak states as follows:

1. This case involves a government complaint in intervention and four consolidated *qui tam* actions, each alleging that defendant Walgreens and its related entities violated the False Claims Act by submitting false claims for controlled substances. Dkt. 21, 58 (No. 18 C 5452); Dkt. 1 (No. 22 C 6052); Dkt. 11 (No. 22 C 6366); Dkt. 5 (No. 23 C 1617). The United States’s complaint in intervention also alleges violations of the Controlled Substance Act. Dkt. 58 (No. 18 C 5452).
2. Walgreens and the United States are continuing settlement discussions and service of the complaints may impede those discussions.
3. All other deadlines remain unchanged. Dkt. 56, 57.

4. If the court is amenable to granting this extension, the new deadline for service of all complaints would be April 17, 2025, which would provide for service 28 days before Walgreens's deadline to answer or otherwise plead.

5. Walgreens's answer to or otherwise plead to all complaints shall remain May 15, 2025. Dkt. 56, 57.

WHEREFORE, Relator T.J. Novak moves to extend the date for service of all complaints to April 17, 2025.

Respectfully submitted,

By: s/ Michael C. Rosenblat

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CERTIFICATE OF SERVICE

I, Michael C. Rosenblat, an attorney, certify that I caused copies of the foregoing Consent Motion to Extend the Date for Service of The Complaints to be served pursuant to ECF as to Filing Users and via electronic delivery or U.S. Mail, proper postage prepaid, to the following individuals.

s/ Michael C. Rosenblat